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Notes ID: 5B246B88B03B0E008525753D005B1491
From: John Lovell/R3/USEPA/US
To: "Davis, Richard" <richardda@state.pa.us>
Copy To: Evelyn MacKnight/R3/USEPA/US@EPA, Elizabeth Ottinger/R3/USEPA/US@EPA
Delivered Date: 1/13/2009 11:46:40 AM
Subject: RE: Perfluoractanoic Acid (PFOA)

By the way, Deb Hoag from Reading may be calling you. I spoke to her earlier this morning about a potential approach for addressing the PFOA in the discharge from the industry. One approach was from a treatment standpoint and simply requiring carbon filtration (this has been done on the drinking water side and they get 95%+ removals). The other approach would be more like the typical pretreatment local limits approach. While there is no water quality standard for PFOA, apparently New Jersey has developed an advisory value of 0.04 ppb, and that value was developed essentially the same way that EPA develops MCLs in the drinking water program. Our drinking water person felt that when EPA develops an MCL for the drinking water program, the number would likely be about the same as New Jersey's advisory value (developed using similar methodologies), and so it wouldn't be unreasonable for Reading to use the 0.04 ppb value as a human health water quality standard. Deb indicated that she might touch base with you to discuss what an appropriate stream flow would be to use with that type of an approach. Essentially, to develop a local limit based on a water quality standard they would need to figure out what an appropriate NPDES discharge level would be in order to figure out what they could accept into the treatment plant (we talked about assuming zero removal in the treatment plant as a conservative assumption).

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01/13/2009 11:33 AM

To

John Lovell/R3/USEPA/US@EPA

cc

Subject

RE: Perfluoractanoic Acid (PFOA)

John

Your ability to come up with answers to difficult questions quickly is always refreshing. Thank you John.

Byron

-----Original Message-----

From: Lovell.John@epamail.epa.gov [mailto:Lovell.John@epamail.epa.gov]
Sent: Tuesday, January 13, 2009 11:11 AM

To: Davis, Richard
Cc: MacKnight.Evelyn@epamail.epa.gov; Ottinger.Elizabeth@epamail.epa.gov
Subject: RE: Perfluoractanoic Acid (PFOA)

I talked to the person in charge of our drinking water enforcement branch and she talked about detection levels of 0.001 ppb. There apparently is an approved drinking water method, but my impression is that there are not a lot of labs that do the analysis. She mentioned MPI Research in State College, Severn Trent (she wasn't sure where that one was located but she thought out west), and Test America in Denver.

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"Davis, Richard"
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John Lovell/R3/USEPA/US@EPA

01/12/2009 10:44 cc
AM

Subject
RE: Perfluoractanoic Acid (PFOA)

John

Do you have anybody done there who might be able to answer the question how low a concentration of PFOA can be measured? I tried two commercial laboratories that I am familiar with and because they have never run it, they can't answer the question. I am concerned because if we are asked for a direct discharge limit and that limit is so low it can't be measured, I think I would like to know that from the git-go.

Thanks, Byron

-----Original Message-----

From: Lovell.John@epamail.epa.gov [mailto:Lovell.John@epamail.epa.gov]
Sent: Friday, January 09, 2009 2:26 PM
To: Davis, Richard
Subject: Re: Perfluoractanoic Acid (PFOA)

To be honest, I don't know that much about it either, although I can forward a couple of e-mails that I sent to Deb Hoag at Reading. I'm still looking into it a bit as well.

John Lovell

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"Davis, Richard"
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John Lovell/R3/USEPA/US@EPA

01/09/2009 01:54 cc
PM

Subject
Perfluoractanoic Acid (PFOA)

Hi John

I have been asked to attend a meeting next Thursday with a manufacturer and representatives of a POTW that has an industrial waste pretreatment program. The manufacturer wants to discuss "any possible issues" concerning their discharge that would contain PFOA. Quite frankly, I had never heard of PFOA before this request. The only information I have was taken from a email from the manufacturer's consultant to someone in our community relations department and is as follows:
Perfluoroactanoic
(PFOA) is a fluorosurfactant used in an etching process. PFOA is a precursor of FSO-100 and has been subject of numerous studies linking low level exposure to PFOA and increased risk of cancer to animals. In 2006, DuPont and EPA entered into a voluntary Stewardship Program to significantly reduce emissions of PFOA by 2010 and completely eliminate the manufacture and purchase or use by 2015. Apparently (per the email) PFOA and its derivatives and precursors are not specifically regulated by the EPA; however, some state and local regulatory jurisdictions have PFOA on their radar (that's cryptic). Regulations may follow or already exist (again per the email). Have you ever heard of PFOA? How would the introduction of this chemical affect a IWPP? Are you aware of any limits for either direct discharge or pretreatment limits? Anything would help John.

Thanks again, Byron

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